

EXHIBIT C

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFEO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES (INDIA)
PRIVATE LIMITED, HP INC., HEWLETT
PACKARD ENTERPRISE COMPANY, and
DAVID GILL,

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

DECLARATION OF KEVAN BARTLEY

I, Kevan Bartley, hereby declare as follows:

1. I am employed by Hewlett Packard Enterprise (“HPE”) as a Global Business Operations Manager for HPE Financial Services.

2. From 2010-2015, I was employed by Defendant Hewlett-Packard Financial Services Company as an Account Delivery Manager in Kuala Lumpur, Malaysia. In that capacity, I was involved with, and have personal knowledge of, certain transactions that I understand to be at issue in this litigation.

3. I have reviewed the documents filed as Exhibits 2 and 3 to Defendants’ Motion for Summary Judgment.

4. I recognize the spreadsheet beginning at page DEF0001142 of Exhibit 2 to be a list of equipment subject to a sale transaction between Hewlett-Packard Financial Services India (“HPFS India”) and an Indian broker named Shinto Creative Elements Private Limited (“Shinto”) in December 2011. The parties understood at the time that Shinto would resell the same equipment to Plaintiff Integrated Communications & Technologies, Inc. (“ICT”) and export it to ICT from India.

5. The equipment listed in Exhibit 2 was a subset of the equipment returned by Tata Global upon the expiration of its lease from HPFS India after the Commonwealth Games. The equipment listed in Exhibit 2 was intended to be the first installment of equipment sold to Shinto, and ultimately to ICT.

6. To the best of my knowledge, the spreadsheet in Exhibit 3 represents the entire list of all equipment returned by Tata Global after the Commonwealth Games.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed April 30, 2020

/s/KevanBartley

Kevan Bartley

CERTIFICATE OF SERVICE

I, Christina T. Lau, Attorney for Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill, hereby certify that the foregoing document was filed using the CM/ECF system and electronic notice will be sent to registered participants as indicated on the Notice of Electronic Filing (NEF) on April 30, 2020.

/s/Christina T. Lau

Christina T. Lau